

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN SECTION OF TENNESSEE  
WESTERN DIVISION

SCOTT TURNAGE , CORTEZ D. BROWN, DEONTAE TATE, JEREMY S. MELTON, ISSACCA POWELL, KEITH BURGESS, TRAVIS BOYD, and TERRENCE DRAIN on behalf of themselves and all similarly situated persons,

PLAINTIFFS,

V.

**BILL OLDHAM**, in his individual capacity and in his official capacity as the Sheriff of Shelby County, Tennessee; **ROBERT MOORE**, in his individual capacity and in his official capacity as the Jail Director of the Shelby County, Tennessee; **CHARLENE MCGHEE**, in her individual capacity and in her official capacity as the of Assistant Chief Jail Security of Shelby County, Tennessee; **DEBRA HAMMONS**, in her individual capacity and in her official capacity as the Assistant Chief of Jail Programs of Shelby County, Tennessee; **SHELBY COUNTY, TENNESSEE**, a Tennessee municipality; and **TYLER TECHNOLOGIES, INC.**, a foreign corporation,

DEFENDANTS.

**Case No. 2:16-cv-2907-SHM/tmp**

**CLASS ACTION COMPLAINT FOR  
VIOLATIONS OF THE CIVIL RIGHTS  
ACT OF 1871, 42 U.S.C. § 1983, AND  
TENNESSEE COMMON LAW**

**JURY TRIAL DEMANDED  
PURSUANT TO FED. R. CIV. PRO.  
38(a) & (b)**

**UNOPPOSED MOTION AND SUPPORTING MEMORANDUM FOR EXTENSION OF  
TIME IN WHICH TO RESPOND TO THE MOTION FOR PARTIAL JUDGMENT ON  
THE PLEADINGS OF DEFENDANTS BILL OLDHAM, ROBERT MOORE,  
CHARLENE MCGHEE, AND DEBRA HAMMONS AS TO THE SECOND AMENDED  
CLASS ACTION COMPLAINT AND DEFENDANT TYLER TECHNOLOGIES, INC.'S  
MOTION TO DISMISS SECOND AMENDED CLASS ACTION COMPLAINT**

COME NOW Plaintiffs Scott Turnage, Cortez D. Brown, Deontae Tate, Jeremy S. Melton, Issacca Powell, Keith Burgess, Travis Boyd, and Terrence Drain, on behalf themselves and all similarly situated persons (hereinafter “the Plaintiffs”), by and through the undersigned counsel, and pursuant to Fed. R. Civ. P. 6 and 12 hereby move this Court to extend their time to July 6, 2017, to respond to the Motion for Partial Judgment on the Pleadings (ECF No. 56) filed by Defendants Bill Oldham, Robert Moore, Charlene McGhee, and Debra Hammons (hereinafter “the Individual Defendants”) as to the Second Amended Class Action Complaint and to July 7, 2017, to respond to Defendant Tyler Technologies, Inc.’s (hereinafter “Tyler”) Motion to Dismiss Second Amended Class Action Complaint (ECF No. 58). In support of their Motion, Plaintiffs state as follows:

**MEMORANDUM OF FACTS AND LAW IN SUPPORT OF MOTION**

1. Plaintiffs’ deadline to respond to the Individual Defendants’ Motion for Partial Judgment on the Pleadings (ECF No. 56) is June 22, 2017.
2. Plaintiffs’ deadline to respond to Tyler’s Motion to Dismiss (ECF No. 58) is June 23, 2017.
3. This is a complex class action lawsuit filed on behalf of the Plaintiffs.
4. As the aforementioned motions are potentially dispositive, Plaintiffs require additional time to properly and thoroughly research and brief the issues raised by both the Individual Defendants and Tyler.
5. Pursuant to Local Rule 7.2(a)(1)(B), counsel for Plaintiffs consulted with counsel for both the Individual Defendants and Tyler regarding these extensions.
6. Counsel for the Individual Defendants and Tyler do not oppose these Requests for Extensions of Time.
7. This is the Plaintiffs’ first request for extensions.
8. A proposed Order granting this Motion will be e-mailed to the Court for its consideration.

Therefore, Plaintiffs respectfully request that the Court extend to July 6, 2017, their time to respond to the Individual Defendants' Motion for Partial Judgment on the Pleadings and July 7, 2017, to respond to Tyler's Motion to Dismiss.

Respectfully submitted,

/s/ Michael G. McLaren

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**CERTIFICATE OF SERVICE**

I, the undersigned, do hereby certify that on June 22, 2017, the foregoing was served via the Court's ECF filing system to all counsel of record, including:

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